

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

JERRY B. JORDAN  
4265 58<sup>th</sup> Avenue, #4  
Bladensburg, Maryland 20710

*Plaintiff*

v.

: CASE No.: \_\_\_\_\_

WASHINGTON AREA TRANSIT AUTHORITY :  
600 5<sup>TH</sup> Street, NW :  
Washington, DC 20001 :  
SERVE: :  
PATRICIA Y. LEE, ESQ., :  
General Counsel :  
600 5<sup>TH</sup> Street, NW :  
Washington, DC 20001 :

*Defendant*

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**COMPLAINT AND JURY DEMAND**

COMES NOW, the Plaintiff, Jerry B. Jordan, by and through undersigned counsel, and  
sues the Defendant, Washington Metro Area Transit Authority ("WMATA"), and as grounds  
therefore states,

**Jurisdiction**

1. This Court has jurisdiction over this matter as it arises from an accident involving  
personal injury which occurred within this County,
2. The Court has personal jurisdiction over the Defendant WMATA as the employer of the  
bus operator and owner of the bus which the operator was driving during the course, and within  
the scope, of their employment with WMATA at the time of the accident.

**COUNT I**

3. Plaintiff Jordan incorporates the preceding numbered paragraphs as if fully stated herein.

4. On or about January 22, 2018, Plaintiff Jordan was working as a truck helper on a trash truck owned and operated by Bates Trucking Co.

5. During the course of his work on the back of his truck on Riverdale Road at or near its intersection with 5<sup>th</sup> Avenue.

6. At that same time and place, a bus, owned and operated by WMATA negligently attempted to come around the Bates truck and struck Plaintiff Jordan with its side mirror.

7. Under the doctrine of vicarious liability/ *respondeat superior*, Defendant WMATA is liable for the negligence of its employee taken during the course, and within the scope, of their employment with WMATA.

8. Defendant WMATA's bus operator was negligent in failing to keep a proper lookout, failing to pay full time and attention to their driving, exceeding a safe and reasonable speed under the existing circumstances, failing to keep her vehicle under proper control so as to avoid an accident, failing to maintain a safe and proper distance from the other vehicles and persons so as to avoid an accident, failing to obey the rules of the road as they then and there existed, failing to operated their vehicle so as to avoid an accident, and such other negligence and breach of duties that may be learned of during discovery or shown during the trial of this matter.

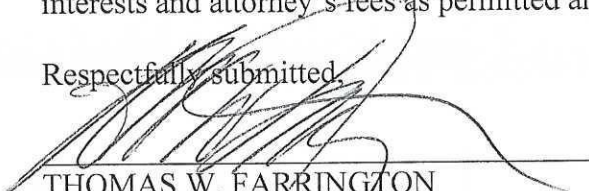
9. Defendant WMATA's bus operator's negligence was the sole cause of this without any negligence on the part of Plaintiff Jordan contributing thereto.

10. As a direct and proximate result of this collision, Plaintiff Jordan suffered, and will continue to suffer, severe and permanent physical injuries, has incurred medical expenses in the past and will continue to incur medical expenses in the future, has lost and will continue to lose time from his employment and corresponding loss of income, has suffered a loss of economic opportunity and earning capacity in the past and will continue to suffer such loss(es) in the future

and corresponding loss of income, has suffered a loss of personal property, and has suffered and will continue to suffer from non-economic and other damages.

WHEREFORE, the Plaintiff, Jerry B. Jordan demands judgement against Defendant WMATA, for an amount greater than Seventy Five Thousand Dollars (> \$75,000.00) plus costs, interests and attorney's fees as permitted and deemed appropriate by this Court.

Respectfully submitted,



THOMAS W. FARRINGTON  
CPF No.: 9504060001  
4204 Ambler Drive  
Kensington Maryland 20895  
Phone: 301.461.6990  
Facsimile: 443.576.0571  
[Tfarri8084@aol.com](mailto:Tfarri8084@aol.com)

**JURY DEMAND**

Plaintiff Jerry B. Jordan demands a jury on all issue herein.



Thomas W. Farrington

**LAW OFFICE OF  
THOMAS W. FARRINGTON LLC  
4204 AMBLER DRIVE  
KENSINGTON, MD 20895-4001**

**PATRICIA Y. LEE, ESQ.,  
General Counsel  
WMATA  
600 5<sup>th</sup> Street, NW  
Washington DC 20001**



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EXHIBIT C R47556.04

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